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8 Attorney for Defendant
9 CHRISTOPHER KINNEY

10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 SAN FRANCISCO DIVISION

11 UNITED STATES OF AMERICA,)	CASE NO. CR 16-0531 EMC
)	
12 Plaintiff,)	STIPULATION AND [PROPOSED] ORDER
)	CONTINUING HEARING AND EXCLUSION
13 v.)	OF TIME UNDER THE SPEEDY TRIAL ACT
)	
14 CHRISTOPHER KINNEY,)	
)	
15 Defendant.)	

16 **STIPULATION**

17
18 The parties hereby request that the status conference hearing date of July 18, 2018, presently
19 scheduled at 2:30 p.m. before the Honorable Edward M. Chen, be vacated and the matter be reset for
20 further status hearing on August 15, 2018 at 2:30 p.m.. Defendant's counsel represents that she has
21 fully informed Mr. Kinney of his Speedy Trial rights and that, to her knowledge, her client understands
22 those rights and agrees to waive them. Defendant's counsel further believes that her client's decision
23 to give up the right to be brought to trial earlier than if time were not excluded from the Speedy Trial
24 Act is an informed and voluntary one.

25
26 The parties agree and stipulate that time under the Speedy Trial Act should be excluded from
27 the date of this filing until August 15, 2018, under 18 U.S.C. §3161(h)(7)(B)(iv), for effective
28 preparation of defense counsel while the neuropsychological report is prepared.

1 SO STIPULATED.

2 ALEX TSE
3 Acting United States Attorney

4 DATED: May 25, 2018

/s/ Karen Kreuzkamp

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6 KAREN KREUZKAMP
Assistant United States Attorney

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8 DATED: May 25, 2018

/s/ Gail Shifman

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10 GAIL SHIFMAN
Attorney for Defendant
CHRISTOPHER KINNEY

11
12 **[~~PROPOSED~~] ORDER**

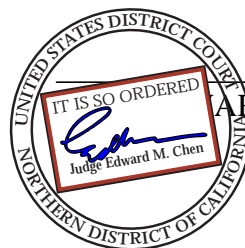
13 Based on the assertions and agreement of the parties as set forth in the Stipulation, and good
14 cause having been shown,

15 IT IS HEREBY ORDERED THAT the above-captioned matter is continued to August 15,
16 2018 at 2:30 p.m., before the Honorable Edward M. Chen for further status conference.

17 The Court further finds that failing to exclude the time between the date of this filing and
18 August 15, 2018, would unreasonably deny defense counsel the reasonable time necessary for
19 effective preparation, taking into account the exercise of due diligence. 18 U.S.C. §3161(h)(7)(B)(iv).
20 The Court further finds that the ends of justice served by excluding the time between now and August
21 15, 2018, from computation under the Speedy Trial Act outweigh the best interests of the public and
22 the defendant in a speedy trial.

23
24 Accordingly, IT IS FURTHER ORDERED that the time between today's date and August 15,
25 2018, shall be excluded from computation under the Speedy Trial Act. 18 U.S.C. ' 3161(h)(7)(B)(iv).

26 DATED: May ³⁰____, 2018



EDWARD M. CHEN

UNITED STATES DISTRICT JUDGE

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